

Exhibit D

Rebecca Borowitz

From: Ted Normand
Sent: Wednesday, March 08, 2006 9:20 AM
To: 'Shaughnessy, Todd'
Cc: Sorenson, Amy
Subject: RE: Certain Document-Production Issues

REDACTED

From: Shaughnessy, Todd [mailto:tshaughnessy@swlaw.com]
Sent: Monday, February 27, 2006 8:45 PM
To: Ted Normand
Cc: Sorenson, Amy
Subject: RE: Certain Document-Production Issues

REDACTED

With respect to the fourth bullet point, and as we discussed, IBM is preparing an updated privilege log. We hope to have that completed by next week. As we also discussed, I am assuming that SCO is likewise updating its privilege log and will promptly provide it to us.

REDACTED

If you have questions about the foregoing, please let me know. Thanks.

Todd

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From: Ted Normand [mailto:TNormand@BSFLLP.com]
Sent: Friday, February 17, 2006 12:31 PM

5/3/2006

To: Shaughnessy, Todd
Cc: Sorenson, Amy
Subject: Certain Document-Production Issues

Todd --

Further to our discussion yesterday, I note below certain SCO inquiries re IBM document production that I believe are outstanding. I attach the relevant correspondence for your convenience.

REDACTED

- My inquiries to you last week (on February 6, for example) regarding a privilege log containing the documents identified in the text of Greg Lembrich's January 13 letter to me regarding the several documents that IBM is recalling as privileged.

REDACTED

Please let me know IBM's views on the foregoing at your earliest convenience. Regards,

Ted

5/3/2006